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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

KRISTINA ANN CAREFELLE,  
  
PLAINTIFF,  
  
vs.  
  
COLLEGE OF CHARLESTON,  
  
DEFENDANT.

C.A. NO. 2:05CV1225-PMD-RSC  
State Court Case No. 05-CP-10-1348  
**DEFENDANT'S ANSWERS TO LOCAL  
CIVIL RULE 26.01  
INTERROGATORIES**

The Defendant, College of Charleston, answering the Interrogatories pursuant to Local Civil Rule 26.01 of the Federal Rules of Civil Procedure, state as follows:

**INTERROGATORY NO. (A)**

State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:** Not applicable.

**INTERROGATORY NO. (B)**

As to each claim, state whether it should be tried by jury or non-jury and why.

**ANSWER:** All claims should be tried by jury.

**INTERROGATORY NO. (C)**

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

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**ANSWER:** The Defendant is not a publicly-owned company.

**INTERROGATORY NO. (D)**

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER:** This lawsuit was originally filed in the Court of Common Pleas, Charleston County. The lawsuit involves acts allegedly occurring in Charleston, South Carolina.

**INTERROGATORY NO. (E)**

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER:** This action is not related in whole or in part to any other matter filed in this District.

**INTERROGATORY NO. (F)**

If the defendant is improperly identified, give the proper identification and state whether counsel will accept service on an Amended Summons and pleading reflecting the correct identification.

**ANSWER:** The Defendant is properly identified.

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**INTERROGATORY NO. (G)**

If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER:** Not applicable.

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Dated: April 27 2005